

EXHIBIT 17

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

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5 IN RE: NATIONAL :
PRESCRIPTION : MDL No. 2804
6 OPIATE LITIGATION :
_____ : Case No.
7 : 1:17-MD-2804
THIS DOCUMENT RELATES :
8 TO ALL CASES : Hon. Dan A. Polster

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10 Friday, December 21, 2018
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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14 Videotaped deposition of PETER RATYCZ, held at
15 the offices of Cavitch, Familo & Durkin,
16 1300 East Ninth Street, Cleveland, Ohio, commencing at
17 8:59 a.m., on the above date, before Carol A. Kirk,
18 Registered Merit Reporter and Notary Public.

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22 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
23 deps@golkow.com
24

1 Q. Okay. Why not?

2 A. Because we do have a procedure --
3 what happened here is that -- this was tied to
4 our VAWD accreditation. And there's some
5 background on that. We thought we needed to
6 have this VAWD accreditation. VAWD stands for
7 Verified Accredited Wholesaler Distributor.

8 And this accreditation is for
9 anybody who's selling, you know, medications.
10 It was a requirement by a payer to have this in
11 place. There was a gray area there in our
12 interpretation. And I'll answer your question.
13 It's just some background there.

14 Q. No, no. Please continue.

15 A. There was a gray area there that
16 we did not -- since we're a distributor to our
17 own stores, whether we needed that. Because
18 we're not distributing to a customer.
19 Essentially our stores, I guess, are our
20 customer.

21 So we didn't think we needed it.
22 It was recommended that we go through this VAWD
23 accreditation process. We got halfway through
24 that process. The payer said, "No, you don't